

EXHIBIT 6



Kimberly Moin <kmoin@nklawllp.com>

Staten v. City of Philadelphia, et al | Case No: 24-cv-01380 | ROGs and RFPDs

Kimberly Moin <kmoin@nklawllp.com>

Tue, Feb 25, 2025 at 10:48 AM

To: "Kevin Harden Jr." <kharden@rossfeller Casey.com>

Cc: Perry Wasserman <pwasserman@nklawllp.com>, Joel J Feller <jfeller@rossfeller Casey.com>, Stacey Mitchell <stacey.mitchell@rossfeller Casey.com>, Danielle Buford <danielle.buford@rossfeller Casey.com>, Jami Galbraith <jgalbraith@nklawllp.com>, Natalie Adeeyo <nadeeyo@nklawllp.com>, Ephraim Siff <esiff@nklawllp.com>, Avi Kamionski <akamionski@nklawllp.com>, Shneur Nathan <snathan@nklawllp.com>, Derek Kane <derek.kane@phila.gov>

Good morning, Mr. Harden,

Last Tuesday you advised that we should receive your client's responses to our discovery requests by the end of the week. To date, we have not received the same. Can you please provide our office with an update as to when we can receive them?

Thank you.

Kim

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Kevin Harden Jr. <kharden@rossfeller Casey.com>

Tue, Feb 25, 2025 at 12:14 PM

To: Kimberly Moin <kmoin@nklawllp.com>

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My apologies Ms. Moin:

The delay is related to Mr. Staten's housing insecurity. He let us know that he had a box of documents from his time in prison but that he had to leave them with a friend when he was released as he did not have a stable place to stay. We do not know if those documents were destroyed or discarded by this 3rd party and multiple attempts to recover them have been unsuccessful.

We will provide what we have for now, but wanted to make sure we turned over everything.

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